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**To:** <secretary@fmc.gov>  
**Date:** 9/28/04 7:54PM  
**Subject:** NVOCC-filing of tariffs

Ladies and Gentlemen-

We are a NVOCC and would like to comment on the proposal by some NVOCCs to obtain the same benefits presently allowed to VOCCs. We are in support of the idea that public tariff's be abandoned and that the FMC apply the same rules to both VOCCs and NVOCCs

Presently, we ship approximately 1000 FEU's per year in our NVOCC. We purchase space from 6 carriers and book the cargo on the carrier that suits each individual customer's specific need. Our shipments are predominately FCL.

Most VOCCs will only work with customers who will sign a contract. As an NVOCC, we fill the niche for small shippers who don't have guaranteed sales on which to base a contract. Our ability to purchase blocks of space and resell it at the rates comparable to larger shippers guarantys that our small US shippers can venture into the world economy and create new opportunities.

The shipper reaps no benefit from us having an internet tariff. Most are not searching a data base to get the best price. They all shop a combination of price and service. And service is the value added benefit that makes a NVOCC a desirable option.

Those that do benefit are the VOCC's who can check our sell rates and adjust their prices accordingly, and the parties that maintain our tariffs for a fee.

We ask you to consider changing the FMC requirement for NVOCCs to file rates in a public tariff and give us the privileges extended to the VOCCs.

Yours truly,

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